

UNITED STATES BANKRUPTCY COURT
FOR THE
DISTRICT OF MASSACHUSETTS (BOSTON)

In Re: James David Eacobacci,
Debtor

Chapter 13
Case No. 23-12084

MOTION TO EXTEND TIME TO FILE OBJECTION TO CONFIRMATION

Now comes Kate Heidbrink, attorney for Gregory Funding LLC as servicer for U.S. Bank National Association, as Indenture Trustee on behalf of and with respect to Ajax Mortgage Loan Trust 2021-G, Mortgage-Backed Securities, Series 2021-G ("Movant"), and hereby requests an extension of time to object to confirmation of the Debtor's plan filed at Docket No. 23. Our office was recently retained to represent Movant. A proposed Objection to Confirmation setting forth the grounds is being filed concurrently with the instant Motion.

MOVANT

By its Attorneys,

/s/ Kate Heidbrink
Kate Heidbrink, Esq.
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Dated: March 19, 2024

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CERTIFICATION OF SERVICE

I, Kate Heidbrink, Esq., of Friedman Vartolo, LLP, do hereby certify that on March 19, 2024 I caused to be served a copy of the Objection to Confirmation on the attached service list by mailing a copy of same by first class mail, postage prepaid or other method specified on the service list.

Signed this 19th day of March, 2024

/s/ Kate Heidbrink
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SERVICE LIST

VIA ECF

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VIA US MAIL

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